IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA MATARAZZO, on behalf of)
herself and all others similarly situated,)
•	Civil Action No. 11-5439
Plaintiff,)
) CLASS ACTION
v.)
)
EQUIFAX INFORMATION)
SERVICES, LLC,)
)
Defendant.)
	_)

JOINT PROPOSED DISCOVERY PLAN

Pursuant to Federal Rule of Civil Procedure 26(f), counsel for the Plaintiff and Defendant hereby submit this Joint Proposed Discovery Plan.

Defendant has represented that it will be filing a motion to dismiss, which Plaintiff will oppose. Accordingly, the parties propose that further scheduling shall abide the Court's disposition of the motion to dismiss. Following that disposition, the parties proposed that they meet and confer, and if necessary, have a status conference with the Court, concerning the scheduling of all discovery, expert reports, class certification and dispositive motion deadlines as appropriate.

FRANCIS & MAILMAN, P.C.

By: /s/ James A. Francis
JAMES A. FRANCIS
ERIN A. NOVAK
Land Title Building, 19th Floor
100 South Broad Street
Philadelphia, PA 19110
(215) 735-8600

ROBERT P. COCCO, P.C. ROBERT P. COCCO 1500 Walnut Street, Suite 900 Philadelphia, PA 19102 (215) 351-0200

CONSUMER LITIGATION ASSOCIATES, P.C. LEONARD A. BENNETT 12515 Warwick Boulevard, Suite 100 Newport News, VA 23606 (757) 930-3660

Attorneys for Plaintiff and the Class

By:

King & Spalding LLP 1180 Peachtree Street Atlanta, Georgia 30309-3521

Tel.: (404) 572-3079
Fax: (404) 572-5172
TLove@KSLAW.com
Attorneys for Defendant Equifax Information
Services, LLC